



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Nevada Fish and Wildlife Office

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June 4, 2007

James J. Eardley, Chairman
Washington County Commission
Vision Dixie Steering Committee
197 East Tabernacle
St. George, Utah 84770

Dear Chairman Eardley:

Subject: Fragmentation of the Red Cliffs Desert Reserve

The Fish and Wildlife Service (Service) is interested in the implementation of Washington County's Habitat Conservation Plan relative to the ongoing "Vision Dixie" initiative to help steer urban growth. The Service's Nevada Fish and Wildlife Office, through its role as range-wide lead for desert tortoise recovery, and the Utah Fish and Wildlife Office, through its role in local desert tortoise recovery and HCP implementation, are providing comments on the implications of fragmenting the Red Cliffs Desert Reserve with transportation corridors.

The Upper Virgin River Recovery Unit, which includes all tortoise habitat in Washington County except for the Beaver Dam Slope, is the smallest recovery unit in the desert tortoise's range. This relatively small area is fragmented by Interstate Highway 15, State Highway 18, and the rapidly growing St. George and neighboring urban areas. As a result, the 1994 desert tortoise recovery plan recognized the need for intensive management to ensure the long-term persistence of the tortoise in the recovery unit. In December 1995, Washington County completed a Habitat Conservation Plan that established the Red Cliffs Desert Reserve (RCDR) and committed to implement management actions that place the desert tortoise as the highest priority.

The 30,000 acres or so of tortoise habitat within the RCDR is a fragile cornerstone of the Upper Virgin River Recovery Unit, and this habitat has already been subjected to severe pressures and fragmentation. In addition to the highways and urban areas noted above, the tortoise population within RCDR has recently declined in association with extended drought and an outbreak of upper respiratory tract disease. In 2005, wildfires burned about 25% of the tortoise habitat within the reserve.

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James J. Eardley, Chairman

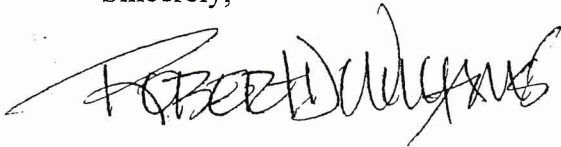
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As a result of these existing pressures and the already small size of the reserve, current proposals in the Vision Dixie process to construct a "Northern Corridor" transportation route through the RCDR would severely threaten the survival and recovery of the desert tortoise within this recovery unit. Any transportation corridor would further increase the risk to the desert tortoise population and accelerate its decline by increasing fire frequency, noise disturbance, increased human access, and direct mortality along the corridor.

We appreciate Washington County's need to plan for and steer the direction of urban growth. However, scenarios routing transportation corridors through the RCDR were considered and eliminated during the original development of Washington County's Habitat Conservation Plan due to their incompatibility with maintaining the tortoise population within the reserve. Construction of a new road or highway through the RCDR conflicts with the desert tortoise recovery plan and is inconsistent with the terms of the county's Habitat Conservation Plan and incidental take permit. Therefore, it will be important to develop alternatives that avoid the need for a northern corridor through the reserve.

If you would like to further discuss our concerns about the desert tortoise population within the RCDR, we would be happy to arrange for Roy Averill-Murray, the Service's Desert Tortoise Recovery Coordinator, to meet with the Habitat Conservation Advisory Committee. Please let either of us know if you would like to schedule such a meeting, or call Roy at 775-861-6362.

Sincerely,



Robert D. Williams
Field Supervisor
Nevada Fish and Wildlife Office



Larry Crist
Field Supervisor
Utah Fish and Wildlife Office

cc:

Karl Wilson, Chairman, Washington County Habitat Conservation Advisory Committee
Bill Mader, Administrator, Washington County Habitat Conservation Plan
Alan Matheson, Executive Director, Envision Utah